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May 8, 2025

VIA ECF ONLY

Hon. Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

MEMO ENDORSED

Re: *Flycatcher Corp. Ltd. v. Affable Avenue LLC et al.*
Case No. 24-cv-09429 (KPF)

Dear Judge Polk Failla:

This office represents defendant Top Experience Company LLC d/b/a We Pay Cost LLC (“TEC”) in the above-captioned matter. We write to the Court now in search of a 3-day extension of time for TEC to file its opposition to plaintiffs’ motion for leave to file its Second Amended Complaint. (ECF 115 *et seq.*) At present, TEC’s opposition is due to be filed by May 13, 2025. *See* L. Civ. R. 6.1(b). TEC seeks until **May 16, 2025**, to file its opposition.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), TEC respectfully submits “good cause” exists for its request for additional time. Despite the exercise of due diligence, the press of other matters before this and other courts makes meeting the current deadline for TEC’s opposition a substantial challenge. TEC seeks a meaningful opportunity to prepare and present a memorandum that thoroughly explains why plaintiffs’ motion for leave to amend should be denied.

Pursuant to § 2(C)(i) of Your Honor’s Individual Rules, TEC further responds as follows:

- i. TEC’s original due date to oppose the motion is May 13th, 2025;
- ii. No prior request for an extension of time by which to oppose the motion has been made;
- iii. TEC requests an additional 3 days to respond to the motion — until **Friday, May 16th, 2025**.

Hon. Katherine Polk Failla, U.S.D.J.

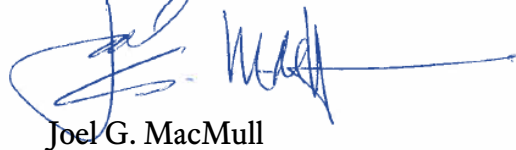
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- iv. Counsel for plaintiffs' consent to this request.
- v. An extension of the time for TEC to respond to the motion does not impact any other presently scheduled date.

The Court's continued attention to this matter is appreciated.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Joel G. MacMull", with a long horizontal flourish extending to the right.

cc: All Counsel of Record (*via ECF*)

Application GRANTED. The deadline for Defendant TEC to file its opposition to Plaintiffs' motion for leave to file their second amended complaint is hereby ADJOURNED to on or before **May 16, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 125.

Dated: May 8, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Katherine Polk Failla", written in a cursive style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE